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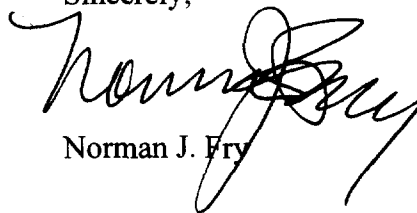
William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

**Re: Errata to Delmarva Power & Light Co. Comments in CC Docket No.
96-98**

Dear Mr. Caton:

Tendered herewith for filing are an original and sixteen copies of an Errata dated May 21, 1996 to the Comments filed by the Delmarva Power & Light Company ("Delmarva") in CC Docket No. 96-98 on May 20, 1996. In order to conserve the staff's resources, sixteen conformed copies of Delmarva's Comments, including the pages added or changed by the Errata, are provided.

Sincerely,


Norman J. Fry

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In re Matter of

Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996

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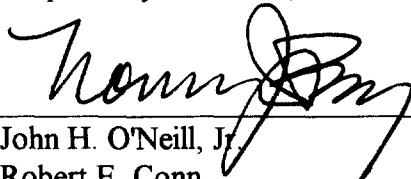
CC Docket No. 96-98

ERRATA TO COMMENTS OF DELMARVA POWER & LIGHT COMPANY

Delmarva Power & Light Company filed its Comments in CC Docket No. 96-98 on May 20, 1996. This Errata provides a Table of Contents and corrects typographical errors. The Table of Contents should be inserted at page iv. Other pages attached to this Errata should be inserted in Delmarva's Comments in place of the corresponding pages therein, and the original pages discarded.

Respectfully submitted,

By:



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Its Attorneys

May 21, 1996

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	2
II. THE COMMISSION SHOULD ADOPT RULES RELATING ONLY TO RATES AND PROCEDURE UNTIL IT HAS GAINED KNOWLEDGE AND EXPERIENCE IN REGULATING THE ELECTRIC POWER INDUSTRY	3
A. The Commission Should Rely Upon Its Well-Developed Common Carrier Nondiscrimination Jurisprudence to Adjudicate Pole Attachment Access Disputes	4
B. Affiliates of Facilities Owners Should Be Afforded Access on the Same Terms as Third-Party Telecommunications Carriers, But Encumbering Access of Owners To Their Own Facilities Is Contrary to the Public Interest	7
C. The Commission Should Consider State Regulations in Mandating Access to Poles, Ducts, Conduits, and Rights-of-Way	10
III. COMMENTS RELATING TO CAPACITY CONSTRAINTS, DENIAL OF ACCESS FOR SAFETY, RELIABILITY, AND GENERALLY- APPLICABLE ENGINEERING PURPOSES	12
A. "Capacity" Should Be Determined On An Engineering Basis, With The Facility Owner Being Permitted To Reserve Reasonable Capacity for Reliability and Expansion	12
B. Unnecessary Duplication of Facilities Should Be Avoided and Facility Owners Must Be Allowed to Reserve Capacity	14
C. Electric Utilities Should Have Wide Latitude To Determine What Constitutes Valid Safety, Reliability, or Generally-Applicable Engineering Purposes Under Section 224(f)(2)	17
D. The Commission Should Require Compliance with the National Electrical Safety Code and Structural Integrity As Important Safety Criteria	20
IV. COMMENTS REGARDING NOTICE AND PAYMENT FOR ADDITIONS OR MODIFICATIONS TO ATTACHMENTS	21
A. The Commission Should Defer to Local Regulations or Local Utility Councils or Organizations With Respect to Notice, and Only Establish Default Notice Requirements Where Existing Regulations or Procedures Have Not Been Adopted.	22

B. "Proportionate Costs" Should Be Determined By Dividing the Make-Ready Costs By the Number of Attaching Entities (Including The Utility) That Elect To Add To Or Modify Their Attachments	24
C. Make-Ready Proportionate Costs Should Not Be Offset By Potential Revenue Increases To The Owner	25
D. The Commission Should Not Restrict The Facility Owner's Right To Modify Its Facilities	26
V. CONCLUSION	27

Delmarva Power & Light Company
May 20, 1996

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Matter of)	
)	
Implementation of the Local Competition)	
Provisions in the Telecommunications Act)	CC Docket No. 96-98
of 1996)	
)	
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COMMENTS OF DELMARVA POWER & LIGHT COMPANY

Delmarva Power & Light Company ("Delmarva"), by its attorneys and pursuant to Section 553 of the Administrative Procedure Act, 5 U.S.C. § 553 (1994) and the Commission's Notice of Proposed Rulemaking (the "NPRM") in the above-captioned docket adopted April 19, 1996, hereby submits its Comments. This NPRM is intended to implement the local exchange telephone company ("LEC") interconnection requirements in new Section 251 of the Communications Act of 1934 (the "1934 Act"), added by Section 101 of the Telecommunications Act of 1996 (the "1996 Act"). Section 251(b)(4) imposes upon a LEC the "duty to afford access to the poles, ducts, conduits, and rights-of-way of such carrier to competing providers of telecommunications services on rates, terms, and conditions that are consistent with section 224." A small portion of the NPRM (¶¶ 220-225) relates to implementation of Section 224 as it relates to pole attachments. It appears this section would be applicable to electric utilities as well as LECs. Delmarva's comments are directed towards and limited to the Commission's inquiries regarding pole attachments in the NPRM ¶¶ 220-225, as those rules would apply to electric utility companies.

Public utilities, including utilities such as Delmarva that are not holding companies, are presently considering providing telecommunications services to the public. While Congress did not specifically address individual investor-owned utilities like Delmarva, Congress clearly considers that the entry of public utilities into the telecommunications business is in the public interest. This belief is evidenced by Section 103 of the 1996 Act, which permits holding companies registered under Section 5 of PUHCA^{17/} to provide telecommunications services to the public so long as they do so through a subsidiary which has been granted Exempt Telecommunications Company status by this Commission.

Delmarva recognizes that it would be inappropriate for an electric utility or its telecommunications affiliate to be able to gain a competitive advantage over independent telecommunications carriers due to preferential terms or conditions of access to the poles, ducts, conduits and rights-of-way of the electric utility. In each of the states in which Delmarva provides electric service, cross-subsidization is precluded by regulatory requirements for proper accounting and allocations of costs, and some affiliate transactions are subject to regulation under the Virginia Affiliates Act.^{18/} Accordingly, it would be appropriate for the Commission in any rulemaking, to require an electric utility to afford comparable access to its facilities for affiliates and third-party telecommunications carriers.

The Commission also requested comment as to whether the owner (i.e., the electric utility itself) of the pole should be precluded from attaching its own equipment except under the

^{17/} Public Utility Holding Company Act of 1935 § 5, 15 U.S.C. § 79e (1994) ("PUHCA").

^{18/} Va. Code Ann. §§ 56-76 to 56-87 (Michie 1995).